

Spirited Connections Privacy Policy

Spirited Connections is committed to protecting the privacy of an individual's personal information. The following sets out how we aim to protect the privacy of your personal information, your rights in relation to your personal information managed by us, and the way we collect, use and disclose your personal information. In handling your personal information, we will comply with the Privacy Act 1988(Cth) (Privacy Act) and with the thirteen Australian Privacy Principles in the Privacy Act.

We have policies and procedures in place to ensure that:

- Personal information is managed in an open and transparent way
- The privacy of personal information of participants and staff are protected
- We collect and handle personal information fairly
- Personal information we collect is used and disclosed for legally permitted purposes only
- We regulate access to and correction of personal information
- We maintain the confidentiality of personal information through appropriate storage and security.

Client personal information is collected to provide care and services. Personal information we collect could include your:

- Name, address, telephone number and email address
- Date of birth
- Gender
- Emergency contact's telephone number and email
- Health and medical history information

Participant personal information may be collected from:

- The caregiver, the client
- Family members or significant others
- Doctor or other service providers and/or education team
- An advocate

We will collect personal information directly from the client unless:

- We have consent to collect the information from someone else
- We are required or authorised by law to collect the information from someone else
- It is unreasonable or impractical to do so
- You can withdraw your consent at any time by contacting us; although you should be advised that this may impact on our capacity to provide services

Personal information is collected for the purposes of providing care and services. The information may be used to:

- Provide support services
- Enable service providers to provide care and services
- Disclosure of personal information

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We may disclose client personal and health information, for the purpose of care and services, to:

- Service providers who assist us in providing care and services, medical practitioners, external health agencies such as the ambulance service, hospitals, the National Disability Insurance Scheme, and other relevant government organisations
- A person the caregiver or client have nominated as being an advocate, e.g. parent, child or sibling, spouse, a relative, a member of your household, a guardian, an enduring power of attorney, or a person you have nominated to be contacted in case of emergency, provided they are at least 18 years of age.

We may not use or disclose personal information for a purpose other than providing care and services, unless:

- You have consented
- The purpose is related to providing care and services, and you would reasonably expect disclosure of the information for that purpose
- We believe on reasonable grounds that the disclosure is necessary to prevent or lessen a serious and imminent threat to a life, health or safety or a serious threat to public health or public safety
- We have reason to suspect unlawful activity and disclosure is required or authorised by law
- We will not disclose personal information to an overseas recipient

Security of personal information

- We take all reasonable steps to ensure that the personal information we hold is protected against misuse, loss, unauthorised access, modification or disclosure. We hold personal information in both hard copy and electronic forms in secure databases on secure premises and on secure, cloud-based technology, accessible only by our authorised staff.

Accessing the personal information that we hold about you

- Under the Privacy Act, you have a right to access your personal information that is collected and held by us. If at any time you would like to access or change the personal information that we hold about you, or you would like more information on our approach to privacy, please contact us. To obtain access to your personal information, you will have to provide us with proof of identity. We will take all reasonable steps to provide access to your personal information within seven (7) days from your request.

Employee information

- Records of current and past employees which are related to the employment relationship are managed in accordance with workplace laws. Privacy laws may apply to employee personal information if the information is used for something that is not related to the employment relationship between our organisation and the employee.

Volunteer records

- Personal information collected and held by us in relation to our volunteers will be managed in accordance with the Privacy Act.
- Privacy data breaches
- In the event that your personal information is lost, stolen or subject to unauthorised access or disclosure, we will implement our Management of Data Breach Policy and Procedure.

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Use of Artificial Intelligence (AI) Tools

- Spirited Connections Occupational Therapy may use secure, professional artificial intelligence (AI) tools to assist with administrative and clinical documentation tasks such as report writing, resource creation, or communication templates. These tools are used to improve service efficiency and quality, not to make clinical decisions or replace professional judgment.
- All client information entered into AI-assisted systems is handled in accordance with Australian Privacy Principles and NDIS Practice Standards. Identifiable personal or health information is never shared with external AI platforms unless explicit consent has been obtained and the data is securely de-identified.
- AI tools are used under the guidance of qualified Occupational Therapists, and all outputs are reviewed and approved by a human clinician before being shared with clients, families, or stakeholders.

Privacy complaints

- All complaints regarding privacy can be lodged via our complaint handling process.
- At all times, privacy complaints will:
 - Be treated seriously
 - Be dealt with as promptly as possible
 - Be dealt with in a confidential manner
- Not affect your existing obligations or affect the commercial arrangements between you and us.
- You will be informed of the outcome of your complaint following completion of the investigation

Location & Contact

Alstonville Therapy Studio

Email: hello@spiritedconnections.com.au

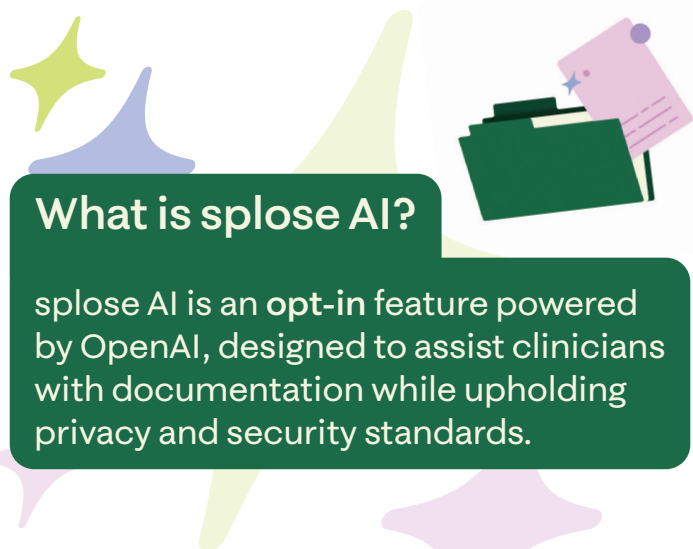
Website: www.spiritedconnections.com.au

Phone: 0411 829 277

Your Privacy, Our Priority



We use splose, an AI-powered practice management software, to manage and process your data.



What is splose AI?

splose AI is an **opt-in** feature powered by OpenAI, designed to assist clinicians with documentation while upholding privacy and security standards.

Can clinicians use splose AI without my consent?

No. Your consent is essential. We will obtain your consent before using splose AI to deal with your data, and you can withdraw it at any time.

Who can access my data?

- Your clinician(s)
- splose's staff on a need to know basis, and third party service providers for the purpose of providing splose's services; and
- Government and regulatory bodies, if required by law.

splose, as well as splose's employees and trusted service providers, adhere to strict privacy and security standards to safeguard your data.

Please note that this document provides a snapshot of splose's data handling relating to splose AI. For more information on how splose processes and protects your data, please see its Privacy Policy available at www.splose.com/privacy-policy.

If you have further questions, please speak with us or contact splose at hello@splose.com.

splose is committed to safeguarding your data. splose's AI-powered features help healthcare practitioners with reporting, progress note writing, and routine tasks – enhancing efficiency while maintaining strict security and privacy standards.

Where is my data stored?

splose stores your data using Amazon Web Services (AWS) and your data is managed following strict privacy policies and industry-leading security measures. splose adheres to relevant Australian privacy laws (including the Privacy Act 1988 (Cth) and Australian Privacy Principles) to guarantee transparent and responsible data handling.

Is my data secure?

Yes absolutely. splose AI keeps your data safe by using strong encryption when it's stored (i.e. AES-256 encryption) and when it's being transmitted (i.e. TLS 1.2+ encryption). OpenAI also goes through regular security checks to make sure everything meets high standards (i.e. SOC 2 compliance audits).

Does OpenAI retain my data?

No. OpenAI does not retain or utilise your data. splose maintains a Business Associate Agreement (BAA) with OpenAI, ensuring zero data retention. Your data will not be used for AI model training by OpenAI or stored beyond its intended use.

How accurate is splose AI?

splose AI continuously improves through user feedback and rigorous monitoring. While AI is designed for high accuracy, splose cannot guarantee 100% accuracy in any AI-generated content, and users are encouraged to review all such content for more accurate results.